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*Attorneys for Defendants Apartment Management
Consultants, LLC, and Rene Richardson*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA *ex rel.*
PEGGY THORNTON, Relator,

and

PEGGY THORNTON,

Plaintiff,

vs.

PORTOLA DEL SOL OPERATOR, LLC, a
foreign limited-liability company; TMIF II
PORTOLA, LLC, a foreign limited-liability
company; APARTMENT MANAGEMENT
CONSULTANTS, LLC, a foreign limited
liability company; and RENE
RICHARDSON, as AGENT of PORTOLA
DEL SOL OPERATOR, LLC,

Defendants.

Case No. 2:21-cv-01123-APG-BNW

**Stipulation and Order to Extend Deadline
for Defendants Apartment Management
Consultants, LLC and Rene Richardson to
Respond to the Second Amended
Complaint**

(Third Request)

1 Relator Peggy Thornton and Defendants Apartment Management Consultants, LLC and
 2 Rene Richardson (collectively “AMC”), by and through their respective undersigned counsel,
 3 hereby stipulate to extend AMC’s deadline to respond to Ms. Thornton’s Second Amended
 4 Complaint (“SAC”) by two weeks, to and including **November 26, 2024**, with the following
 5 background and reasons:

6 1. Ms. Thornton filed her SAC on September 24, 2024. ECF No. 108.

7 2. Under FRCP 15, AMC’s response to the SAC was therefore due on October 8,
 8 2024.

9 3. The Parties stipulated to grant AMC an additional three weeks to assess the SAC
 10 given the multiple rounds of motion-to-dismiss briefing filed thus far and in light of AMC’s
 11 counsels’ conflicting work travel. ECF No. 113. This extension also mirrored the one granted to
 12 co-defendant TMIF. ECF No. 110.

13 4. The Parties subsequently stipulated to grant AMC an additional two weeks to
 14 respond to the SAC due to unexpected scheduling conflicts, primarily including unexpectedly
 15 advanced deadlines in a federal pro bono trial. ECF No. 115.

16 5. During the intervening period, Ms. Thornton and AMC also engaged in renewed
 17 settlement discussions, and the United States is currently reviewing a settlement offer, as required
 18 under the False Claims Act. Ms. Thornton has thus requested to extend the offer period by an
 19 additional two weeks.

20 6. Because preventing AMC from expending additional attorney’s fees to respond to
 21 the SAC during that period would be conducive to settlement, the parties agree it is in their
 22 mutual best interest and judicial economy to likewise extend that response period by two weeks,
 23 to and until November 26, 2024.

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7. The Parties agree that this stipulation is entered into in good faith and will not unduly delay proceedings.

IT IS SO STIPULATED.

Dated: November 11, 2024.

SNELL & WILMER L.L.P.

By: /s/ Gil Kahn

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*Attorneys for Defendant Apartment
Management Consultants, LLC and Rene
Richardson*

Dated: November 11, 2024.

NEVADA LEGAL SERVICES

By: /s/ Elizabeth S. Carmona

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Attorneys for Relator

ORDER

Good cause appearing, Ms. Thornton and AMC's stipulation is **GRANTED**. AMC's deadline to respond to the Second Amended Complaint is extended to and including November 26, 2024.

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: 11/12/2024

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CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **Stipulation and Order to Extend Deadline for Defendants Apartment Management Consultants, LLC and Rene Richardson to Respond to the Second Amended Complaint (Third Request)** by method indicated below:

- ☐ **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).
- ☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.
- ☐ **BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.
- ☐ **BY PERSONAL DELIVERY:** by causing personal delivery by, a messenger service with which this firm maintains an account, of the document(s) listed above to the person(s) at the address(es) set forth below.
- ☒ **BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.
- ☐ **BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.

DATED November 11, 2024

/s/ Tiy Lewis
An employee of SNELL & WILMER L.L.P.

4876-6853-6055